UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA NEW ALBANY DIVISION

IN RE: MATTHEW WELSCH	}	CASE NO. 17-90554-BHL-13
DEBTOR	}	

MOTION TO MODIFY DEBTOR'S CHAPTER 13 PLAN AND NOTICE OF OBJECTION DEADLINE

Comes now the above-captioned Debtor by Counsel, and files his Motion to Modify Debtor's Chapter 13 Plan. In support of this Motion, Counsel for the Debtor states as follows:

- 1. The Debtor proposes to allow a secured claim held by Wells Fargo Financial Bank in the amount of \$4,000.00 plus 0% interest for the value of windows purchased at American Windows. Adequate protection payments will be no less than \$40.00 per month.
- 2. The Debtor is working with Lakeview Loan Servicing direct on a loan modification. Counsel for the Debtor filed a Motion to Modify Secured Debt on October 25, 2017. Said loan modification will cure any arrearages.

WHEREFORE, the Debtor, by Counsel, request the Court to modify his plan by increasing the Debtor's monthly plan payments from \$123.00 per month to \$223.00 per month commencing in September, 2017.

Dated this 30 day of 000 och . 2017.

KOEHLER LAW OFFICE

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MATTHEW WELSH

NOTICE IS GIVEN THAT any Objection must be filed with the Bankruptcy Clerk within **21 days** from the date of service [or such other time period as may be permitted by Fed.R.Bankr.P.9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

U.S. Bankruptcy Court 110 U.S. Courthouse 121 W. Spring Street New Albany, Indiana 47150

The objecting party must ensure delivery of the objection to the party filing the motion, (the Trustee – if not the movant or the objector) (and the Debtor – if not the movant or the objector). If an objection is NOT timely filed, the requested relief may be granted.

CERTIFICATE OF SERVICE

The undersigned certifies that on the day of _______, 2017 a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Joseph M. Black, Jr., Chapter 13 Trustee: jmbecf@trustee13.com
U.S. Trustee: ustpregion10.in.ecf@usdoj.gov

I further certify that a true copy of the foregoing Motion to Modify was sent via U.S. Mail this <u>JISF</u> day of _________, 2017 to all parties attached hereto:

OYD E. KOEHLER

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Label Matrix for local noticing 0756-4 Case 17-90554-BHL-13 Southern District of Indiana New Albany Tue Oct 31 11:48:36 EDT 2017 Best Egg/sst 4315 Pickett Rd Saint Joseph, MO 64503-1600

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Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Homeprjvisa Cscl Dispute Team N8235-04m Des Moines, IA 50306

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Joseph M. Black Jr.
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Cavalry SPV I, LLC c/o Bass & Associates, P.C. 3936 E. Pt. Lowell Rd., Suite 200 Tucson, AZ 85712-1083

(p)DISCOVER FINANCIAL SERVICES LLC PO BOX 3025 NEW ALBANY OH 43054-3025

James Pruett 124 E Washington Street Greensburg, IN 47240-1715

LVNV Funding, LLC its successors and assigns assignee of Marlette Funding Trust II Series 2
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587
Loancare Inc

3637 Sentara Way Virginia Beach, VA 23452-4262

Toyota Motor Credit Corporation P.O. Box 9013 Addison, Texas 75001-9013

U.S. Trustee Office of U.S. Trustee 101 W. Ohio St.. Ste. 1000 Indianapolis, IN 46204-1982 Baptist Health Floyd Credit Bureau Systems, Inc. Po Box 9200 Paducah, KY 42002-9200

Capl/frnrw 26525 N Riverwoods Blvd Mettawa, IL 60045-3440

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Lakeview Loan Servicing, LLC LoanCare, LLC 3637 Sentara Way Virginia Beach, VA 23452-4262

Receivables Management 1312 W Westridge Blvd Greensburg, IN 47240-3251

Toyota Mtr 1111 W 22nd St Ste 420 Oak Brook, IL 60523-1959

Wells Fargo Bank, N.A. PO Box 10438 Des Moines, IA 50306-0438 The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Discoverbank Po Box 15316 Wilmington, DE 19850

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Lakeview Loan Servicing, LLC

End of Label Matrix

Mailable recipients 27

Bypassed recipients

Total

1 28